

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

ANDREW R. PERRONG)	
1657 The Fairway #131 Jenkintown, PA 19046)	
)	
)	
Plaintiff,)	Civil Action
vs.)	No. 19-4228
)	
REWEB REAL ESTATE LLC)	
)	
Et. Al.)	
Defendants.)	Jury Trial Demanded
)	

PLAINTIFF'S REQUEST TO ENTER DEFAULT AGAINST DEFENDANTS
REWEB REAL ESTATE LLC, KYLE MCLAUGHLIN, AND NICHOLAS UMMARINO

TO THE CLERK OF COURT:

Plaintiff ANDREW R. PERRONG respectfully moves that the Clerk of Court enter default against REWEB REAL ESTATE LLC, KYLE MCLAUGHLIN, AND NICHOLAS UMMARINO, for want of an answer. The record in this case indicates that Defendants REWEB REAL ESTATE LLC, KYLE MCLAUGHLIN, AND NICHOLAS UMMARINO have failed to appear or otherwise respond to the complaint within the time prescribed by the Federal Rules of Civil Procedure.

Plaintiff caused the complaint, summons, and other required documents to be served on Defendants on October 2, 2019, as evidenced by the affidavits of service filed in this matter. Dkt. No. 5. An answer was due on October 23, 2019 for all defendants, and the docket indicates none has been filed.

The above-stated facts are set forth in the accompanying declaration of Plaintiff Andrew R. Perrong.

WHEREFORE, Plaintiff prays that the Clerk of Court enter a default against Defendants, REWEB REAL ESTATE LLC, KYLE MCLAUGHLIN, AND NICHOLAS UMMARINO, for want of an answer.

Dated: **November 6, 2019**

/s/
Andrew Perrong
Plaintiff Pro-Se
1657 The Fairway #131
Jenkintown, PA 19046
Phone: 215-791-6957
Facsimile: 888-329-0305
andyperrong@gmail.com

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DECLARATION OF PLAINTIFF ANDREW R. PERRONG IN SUPPORT OF
REQUEST TO ENTER DEFAULT AGAINST DEFENDANTS
REWEB REAL ESTATE LLC, KYLE MCLAUGHLIN, AND NICHOLAS UMMARINO

I, Andrew R. Perrong, declare under penalty of perjury:

1. I am an adult over 18 years of age. I have personal knowledge of the facts set forth herein. I could and would testify to them if called upon to do so.
2. I am the Plaintiff *pro-se* in the above-captioned matter. This declaration is made in support of my request that the Clerk of Court enter default against Defendants REWEB REAL ESTATE LLC, KYLE MCLAUGHLIN, AND NICHOLAS UMMARINO, on the grounds that they have failed to answer or otherwise respond to the complaint within the time prescribed by the Federal Rules of Civil Procedure.
3. I hired a process server in this matter. He returned affidavits of service to me, which indicate that the summons, complaint, and other required documents were personally served on each Defendant on October 2, 2019. I filed a true and correct copy of these proofs with the Court. Dkt. No. 5.
4. According to the Federal Rules of Civil Procedure, including Rule 12(a)(1)(A)(i),

Defendants REWEB REAL ESTATE LLC, KYLE MCLAUGHLIN, AND NICHOLAS UMMARINO were required to file an answer or otherwise respond by October 23, 2019.

5. I have not received any answer or motion to the complaint from Defendants.
6. I checked the docket of the above-captioned case on CM/ECF today, November 6, 2019.

It did not show any answer or other response from Defendants.

Dated: **November 6, 2019**

/s/_____
Andrew Perrong
Plaintiff Pro-Se
1657 The Fairway #131
Jenkintown, PA 19046
Phone: 215-791-6957
Facsimile: 888-329-0305
andyperrong@gmail.com

SWORN DECLARATION

I, Andrew Perrong, declare, depose, and say that I am the Plaintiff *pro-se* in this matter. I am acquainted with the facts and factual allegations set forth in this Request and Declaration. I hereby state that the averments, facts, and factual allegations contained herein are true and correct to the best of my knowledge, information, and belief. This declaration is made according to 28 U.S.C. § 1746.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: **November 6, 2019**

/s/ _____
Andrew Perrong
Plaintiff Pro-Se
1657 The Fairway #131
Jenkintown, PA 19046
Phone: 215-791-6957
Facsimile: 888-329-0305
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